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Wyo. Bar # 6-4504

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 14-CV-00151-ABJ
)	
One Cessna Airplane, Model Number)	
TU-206, bearing Tail Number N6214V)	
and Serial Number U206-1189,)	
)	
and)	
)	
\$259,717 United States Currency,)	
)	
Defendant-Property.)	
)	
SCOTT MICHAEL LEWIS,)	
)	
Claimant.)	

**PLAINTIFF'S FIRST SPECIAL INTERROGATORIES
UNDER SUPPLEMENTAL RULE G(6)**

The United States of America, under authority of Rule G(6) of the Supplemental Rules for Certain Admiralty and Maritime Claims, propounds the following Interrogatories. Claimant Scott Michael Lewis is required to respond within 21 days from the date of service by serving answers, under oath, upon the undersigned Assistant United States Attorney.

DEFINITIONS

For the purpose of the following interrogatories (and for these definitions) the following terms shall have the meanings set forth below:

1. “You” or “your” means Claimant Scott Michael Lewis.
2. “Defendant Currency” refers to the \$259,717 United States Currency (or any part thereof) which is subject to forfeiture in this case. If any answer refers to only a part of the Defendant Currency, particularly describe the part to which that answer refers.
3. “Defendant Airplane” refers to the Cessna Airplane, Model Number TU-206, bearing Tail Number N6214V and Serial Number U206-1189, which is subject to forfeiture in this case.
4. “Identity” means name, current address, and phone number.

INTERROGATORIES

1. Provide your full legal name, date of birth, social security number, driver’s license number and issuing state.

ANSWER:

2. Please set forth a complete list of all addresses where you have lived from January 2010 to present (and the dates of residence corresponding to each of those addresses).

ANSWER:

3. Please set forth a complete list of all phone numbers and email addresses you have used from January 2010 to present (and the dates corresponding to each of those phone numbers and email addresses).

ANSWER:

4. Please provide any other name(s) you have used during your lifetime. If you have used any other names, describe the circumstances for each instance where you used it/them.

ANSWER:

5. Describe with particularity the nature and extent of your alleged ownership or possessory interest in the Defendant Airplane and how you acquired any such interest, including the following:

(a) the Identity of the person from whom you acquired your ownership or possessory interest in the Defendant Airplane with a description of all terms of the transfer agreement;

(b) the reason or reasons for which you acquired an ownership or possessory interest in the Defendant Airplane (if you acquired a possessory interest on more than one occasion, explain the reason for each instance and the Identity of every person associated with providing you possession);

(c) the Identity of each and every person who currently has any ownership or possessory interest in the Defendant Airplane, and a description of all terms related to the transfer agreement(s);

(d) the Identity of each and every person who had any ownership or possessory interest in the Defendant Airplane since April 1, 2013, and a description of all terms related to the transfer agreement(s);

(e) the Identity of any person who provided you any asset (including money, loans, commodities and collateral) and/or any promise (including promissory notes and loan

guarantees) which were used to acquire or otherwise secure your alleged ownership or possessory interest in the Defendant Airplane along with a description of the terms of the agreement for those asset(s) or promise(s);

(f) describe each instance related to your registration of the Defendant Airplane with the Federal Aviation Administration (or any other agency of a state, federal or foreign government) and provide the Identity of any other person involved in the registration of the Defendant Airplane;

(g) describe each instance related to your operation of the Defendant Airplane, including dates and locations of any operation of the Defendant Airplane, the reason for each trip (including any commodity, money, or person transported in the Defendant Airplane during that trip); and the Identity of any other person involved in any operation of the Defendant Airplane (including any person who solicited or financed a trip); and

(h) describe each and every document or source of information relating to your answers to Interrogatory No. 5 (and its subparts) which: (1) evidences any fact relevant to your answer; (2) was used by you to answer the question; or (3) which negates or calls into question your answer.

ANSWER:

6. Describe with particularity the nature and extent of your alleged ownership or possessory interest in the Defendant Currency and how you acquired any such interest, including the following:

(a) the reason or reasons for which you were paid or otherwise given the Defendant Currency; and the Identity of any person(s) who gave you the Defendant Currency;

(b) every discussion, meeting, exchange and transaction with any person involved in your acquisition and possession of the Defendant Currency (including the location of any account at any financial institution which ever held the Defendant Currency or through which the Defendant Currency moved);

(c) the Identity of each and every person who has any ownership or possessory interest in the Defendant Currency or had such an interest since you acquired your alleged interest in the Defendant Currency (including any alleged bailee or bailor); particularly describe the nature and extent of any such interest; and describe each instance related to the ownership or possessory interest of any such other person; and describe any agreement you had or have with any such person;

(d) identify each and every document or source of information relating to your answer to Interrogatory No. 6 (and its subparts) which: (1) evidences any fact relevant to your answer; (2) was used by you to answer the question; or (3) which negates or calls into question your answer.

ANSWER:

Dated this _____ day of October, 2015.

Respectfully submitted,
CHRISTOPHER A. CROFTS
United States Attorney

By: /s/ Eric J. Heimann
ERIC J. HEIMANN
Assistant United States Attorney

VERIFICATION

STATE OF _____)
)ss.
COUNTY OF _____)

Before me, the undersigned authority, on this day personally appeared _____, who being first duly sworn, stated that he has personal knowledge of the facts stated in the foregoing **Answers to Plaintiff's First Special Interrogatories** and that all of the answers are true and correct.

Subscribed and sworn before me this ____ day of _____, 2014.

Witness my hand and official seal.

NOTARY PUBLIC

My commission expires:

CERTIFICATE OF SERVICE

It is hereby certified on the _____ day of October, 2015, a true and correct copy of the foregoing **PLAINTIFF'S FIRST SPECIAL INTERROGATORIES UNDER SUPPLEMENTAL RULE G(6)** was served upon the following by the method(s) indicated below.

David M. Michael
Law Offices of David M. Michael
One Sansome Street, Suite 3500
San Francisco, CA 94104

☐ Electronic Filing
☒ U.S. Mail -- postage prepaid
☐ U.S. Mail -- certified
☐ Hand delivery

Joe D. Bustos
400 E 20th Street
Cheyenne, WY 82001

☐ Electronic Filing
☒ U.S. Mail -- postage prepaid
☐ U.S. Mail -- certified
☐ Hand delivery

/s/ Eric Heimann
United States Attorney's Office